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October 24, 2013

Ryan Furman
Campaign Finance Analyst
Federal Election Commission
999 E St., NW
Washington, DC 20463

Identification Number: C00237198

Reference: Amended April Quarterly Report (2/16/12-3/31/12), received 5/15/13

Dear Mr. Furman:

This letter is in response to your request for additional information, dated September 20, 2013.

Although our previous analyst assured the Committee that there were no further issues related to this report, your letter indicates that the Committee has disclosed contributions that appear to exceed the limits as set forth in the Act:

1. Amerisource Bergen Corporation Political Action Committee: The above referenced report has been amended to accurately disclose the 3/6/12 contribution as designated to the 2012 General Election.
2. Grant Thornton LLP PAC: The above referenced report has been amended to accurately disclose the 3/6/12 contribution as designated to the 2012 General Election.
3. Tyco International Management Company PAC: The above referenced report has been amended to accurately disclose the 3/6/12 contribution as designated to the 2012 General Election.
4. Unum Group Political Action Committee: The above referenced report has been amended to accurately disclose the 3/6/12 contribution as designated to the 2012 General Election.
5. Groom Law Group Chartered PAC: The Groom Law PAC has been refunded \$1250 on 10/22/13.
6. Williams PAC, Inc.: The above referenced report has been amended to accurately disclose the 3/6/12 contribution as designated \$2500 to the 2012 Primary Election and \$2500 to the 2012 General Election.
7. Bob Brooks: The July Quarterly 2013 Report has been amended to accurately reflect the refund issued on 5/14/13 as designated for the 2012 General Election.
8. Robert Henderson: The above referenced report has been amended to accurately reflect the refund issued on 3/30/12 as designated for the 2012 Primary Election.

Finally, by way of explanation, during 2011, the Committee recognized that its data base vendor was being overloaded by the volume of contributions. Many of the RFAs received in early 2011 were the result of donors who had contributed through a joint fundraising committee and not directly to the Committee. Thus, the committee transitioned to a new filing software and processing system vendor in October 2011. This system allows for closer monitoring of all receipts, as well as provides several quality assurance reports to track duplicate entries and excessive contributions. In addition, the current vendor now reviews all donor allocations prior to any distribution from a joint committee to ensure that excessive contributions are not accepted. However, as with any transition from a prior database to a new database, the committee had to work out the kinks in the data transition. This was not a simple process and resulted in some of the issues questioned in the Commissions letters. Please note that data issues from the previous cycle do not affect our current reporting and vetting.

The Committee now de-dupes and performs reviews of the data weekly to identify any excessive contributions that may have been missed during the initial processing. Once excessive contributions are identified, the Committee takes steps to either reattribute, redesignate or refund if necessary. For presumptive reattributions and redesignations, the
